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June 24, 2024

By ECF

Hon. Philip M. Halpern, U.S.D.J.
The Hon. Charles L. Brieant Jr. Federal Building and Courthouse
300 Quarropas Street
White Plains, New York 10601-4150

Re: *Wolf et al. v. Dolgen New York, LLC,*
Case No. 7:23-cv-00558-PMH
Request to Adjourn Case Management Conference

Dear Judge Halpern,

We represent defendant Dolgen New York, LLC (“Dollar General”) in the above referenced matter. We write to respectfully request that the case management conference scheduled on July 22, 2024 be adjourned and rescheduled. The case management conference, which was originally scheduled for June 18, 2024, was *sua sponte* adjourned to July 22, 2024 due to a Court-based scheduling conflict. Plaintiffs consent to this request.

Dollar General requests an adjournment of the case management conference because Trent Taylor, lead counsel for Dollar General, is scheduled to appear in-person for a dispositive motion hearing before the Honorable Stephen V. Wilson in a matter pending in the Central District of California on July 22, 2024, the date to which the case management conference was rescheduled. Accordingly, Dollar General respectfully requests that the case management conference be adjourned to a date and time on which Mr. Taylor is available to attend.

Counsel for the parties have conferred and are available on the following dates to reschedule the case management conference: August 7, 8, 9, 12, 13, 14, and 16. This is any party’s first request for an adjournment of the July 22, 2024 case management conference. No other deadlines are affected by this request.

Thank you for your consideration on this matter.

Respectfully submitted,

/s/ Philip A. Goldstein

Philip A. Goldstein

cc: All Counsel of Record (via ECF)